

**GIBSON, DUNN & CRUTCHER LLP**

LAUREN R. GOLDMAN (*pro hac vice*)

lgoldman@gibsondunn.com

DARCY C. HARRIS (*pro hac vice*)

dharris@gibsondunn.com

200 Park Avenue

New York, NY 10166

Telephone: (212) 351-4000

Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184

emccloskey@gibsondunn.com

ABIGAIL A. BARRERA, SBN 301746

abarrera@gibsondunn.com

One Embarcadero Center, Suite 2600

San Francisco, CA 94111

Telephone: (415) 393-8200

Facsimile: (415) 393-8306

NATALIE J. HAUSKNECHT (*pro hac vice*)

nhausknecht@gibsondunn.com

1900 Lawrence Street Suite 3000

Denver, CO 80202

Telephone: (303) 298-5783

Facsimile: (303) 313-2800

*Attorneys for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL**

This Document Relates To:

Hon. P. Casey Pitts

All Actions

Having considered the Declaration of Lauren R. Goldman in Support of Plaintiffs' Administrative Motion to File Under Seal, filed by Meta Platforms, Inc. on December 10, 2025, pursuant to Civil Local Rule 79-5(f), all materials submitted in support thereof, and other records on file, and having found that good cause exists for the sealing of the documents listed below:

**IT IS HEREBY ORDERED** that parts of the Corrected Rebuttal Expert Report of Georgios Zervas, Ph.D be **SEALED** as outlined below:

Document	Portions of Document to Be Sealed	Designating Party	Reason for Redaction
Corrected Rebuttal Expert Report of Georgios Zervas, PhD	Parts of page I, heading IV(A)(1); page 4, footnote 6; page 7, paragraph 12(a)(i); page 27, footnotes 90-93; page 28, figure 4, paragraph 36, footnotes 93-95; page 29, paragraphs 36-37, footnotes 96-98; page 30, paragraphs 37-39, footnotes 99-101; page 31, paragraph 39, footnotes 102-104; page 32 footnotes 105-107; page 33, footnotes 107-108; page 34, paragraph 42, figures 5-6, footnote 110; page 38, footnote 118; page 39, paragraphs 46-47, footnotes 122, 126-127, 129; page 40, paragraphs 47, heading A(1), paragraph 48; page 41, paragraphs 51-51, footnote 135; page 42, paragraphs 53-54; page 43, paragraph 57, footnote 140; page 44, paragraphs 57, 141; page 48, paragraph 63, footnote 158; page 50, paragraph 67; page 51, paragraphs 67-68, footnotes 167-169;	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems (including the names of specific Hive tables), integrity systems (including how the systems work and how they were developed and detailed information about Meta's finance-related filter), and highly confidential Source Code. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.

1	page 53, footnote 176;		
2	page 55, paragraph 78,		
3	footnotes 186-187;		
4	page 56, paragraphs		
5	78-79; page 57,		
6	paragraph 80, footnote		
7	197; page 72, footnote		
8	237; page 84,		
9	paragraph 266; page		
10	85, figure 28; page 87,		
11	paragraph 112,		
12	footnote 273; page 95,		
13	footnote 297; page 97,		
14	paragraph 123,		
15	footnotes 300-304;		
16	page 98, paragraph		
17	123.		

Dated: \_\_\_\_\_

\_\_\_\_\_  
P. Casey Pitts  
United States District Court Judge